

Application No. 09/918,760

independent claims 1, 9, 16, and 24 specifically claim a backlash reduction apparatus/method; none of the references appear to disclose anything about reducing backlash. Depending claims in each claim set recite additional limitations with regard to backlash reduction that are not even addressed by any of references. Additionally, Applicants respectfully submit that independent 1 one is a means plus function claim entitled to the benefit of 35 U.S.C. § 112, 6<sup>th</sup> paragraph, interpretation, as are all claims dependent therefrom. The examiner has not given claim 1 such an interpretation to this point.

Inasmuch as the references applied do not even begin to disclose or suggest *all* the limitations of the independent claims, let alone the dependent claims, applicants respectfully submit that no *prima facie* case has been established for anticipation or obviousness. The rejections are improper and should be withdrawn, and the claims should be allowed.

In view of the foregoing amendments and remarks the subject application is believed to be in condition for allowance. Therefore, further consideration and allowance of the subject application is requested. If the Examiner considers personal contact advantageous to the disposition of this case, please call Applicants' Attorney, David E. Henn at (585) 423-4299, Xerox Corporation, Rochester, New York 14644, or fax him at (585) 423-5240.

Respectfully submitted,

  
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